



May 1, 2009

Mr. Stephen Kratzke  
Associate Administrator for Rulemaking  
National Highway Traffic Safety Administration  
1200 New Jersey, SE  
Washington, D.C.

Ref: Docket NHTSA-2009-0041

Dear Mr. Kratzke:

Continental stands ready to support NHTSA's efforts to respond to the Congressional mandate to improve rearward visibility of light vehicles to reduce death and injuries resulting from backing incidents.

Continental participated in and endorses the comments of the Automotive Occupant Restraints Council. We would, however, like to add to those comments.

We would like to emphasize the importance of being sure that any rule regarding rear visibility be technology neutral. Existing systems warn the driver with audible warnings or by use of a visual image of the area behind the vehicle. Studies have shown that the driver response to these displays and warnings limit the effectiveness of the systems. We believe that, in the future, sensing systems will be developed that can take the driver response out of the system. These systems will be able to recognize pedestrians that are in danger of being struck and take action to stop the vehicle without driver input. Any rulemaking should encourage this development. Care should be taken to avoid arbitrary fields of view, system response times, etc. that may not be applicable to such systems. The important criteria should be the effectiveness in avoiding contact with pedestrians while backing up.

Continental would welcome the opportunity to discuss these comments with NHTSA and support NHTSA in this effort.

Regards,

A handwritten signature in black ink, reading "Philip M. Headley".

Philip M. Headley  
Chief Engineer, Systems & Technology  
Continental Automotive

cc: E. Mazzae

Continental  
Automotive Systems Division  
One Continental Dr  
Auburn Hills, MI 48326

Phone 248-393-5300  
Fax 248-393-5301